

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION OF CINCINNATI**

IN RE:	:	CASE NO. 23-11308
	:	
RYAN ANTHONY PRESTON TODD	:	CHAPTER 7
	:	
	:	JUDGE BETH A BUCHANAN
DEBTOR.	:	

**COMBINED SECOND MOTION TO EXTEND TIME TO FILE THE REMAINING
DOCUMENTS: SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS AND
MOTION TO CONTINUE THE 341 MEETING OF CREDITORS TO BE HELD IN
PERSON OR VIA VIDEO CONFERENCE**

PLEASE READ THIS NOTICE CAREFULLY

You are hereby notified that the Debtor has filed papers with the Court requesting an Order granting the Debtor's Motion, Application or Objection (hereinafter called the "Motion").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the Court to grant the Motion, or if you want the Court to consider your views on the Trustee's Motion, then on or before Twenty-One (21) days after the Date of Issuance set forth below (the "Deadline"), you or your attorney must file a written response in accordance with the Court's local rules and filing procedures.

The Clerk of Court's address is: U.S. Bankruptcy Court Clerk's Office, 221 East Fourth Street, Ste. 800, Cincinnati, OH 45202-4133.

Copies of the Court's Administrative Procedures for electronic court filings can be found at the following website: <http://www.ohsb.uscourts.gov>

You must file the response early enough so the Court will **receive** it on or before the Deadline.

You must also provide a copy of your response via mail to Patricia J. Friesinger, Esq., Coolidge Wall Co., L.P.A., 33 West First Street, Dayton, Ohio 45402, Elliott Polaniecki, Chapter 7 Trustee, PO Box 42341, Cincinnati, OH 45242 or through the Court's ECF system.

08/01/2023

/s/ Patricia J. Friesinger

Date of Issuance

Patricia J. Friesinger

MOTION

NOW COMES Debtor Ryan Anthony Preston Todd (hereinafter “Debtor”) by and through counsel, and hereby requests additional time to file the remaining required paperwork in this case to **September 1, 2023** and to continue the scheduled 341 Meeting of Creditors to a date to be determined by the Chapter 7 Trustee’s availability after September 1, 2023 and for such meeting to be held either in person or via video conference, in accordance with the Trustee’s preference.

Respectfully submitted,

/s/ Patricia J. Friesinger

Patricia J. Friesinger (00072807)
33 W. First Street, Suite 200
Dayton, OH 45402
Tel: (937) 449-5776 Fax: (937) 223-6705
E-Mail: trustee@coollaw.com
Chapter 7 Trustee

MEMORANDUM

1. The Debtor filed his case on July 13, 2023, and was initially given 14 days, up to and including July 27, 2023, to file the remaining paperwork with the Court, which was additionally extended to August 1, 2023, per the *Order Granting Motion to Extend Time to File the Remaining Documents; Schedules and Statement of Financial Affairs [Doc. 11] [Doc. 12]* entered herein on July 28, 2023.

2. The Court set the 341 Meeting of Creditors for August 8, 2023. The initial extension sought and obtained was a relatively short extension to permit filing of the remaining paperwork in advance of the scheduled 341 Meeting of Creditors. Counsel for the Debtor, at the time of requesting the initial extension, failed to recognize that she was unavailable to attend the 341 Meeting on August 8th due to a conflicting family vacation.

3. The Debtor is still recovering from a traumatic brain injury and has difficulty processing deadlines and assisting in providing the disclosure needed to prepare the remaining schedules and statement of financial affairs. Debtor's counsel has had more difficulty than initially anticipated in obtaining the required disclosures from the Debtor to permit preparation of the remaining bankruptcy documents and provision of the documents required to be produced pursuant to LBR 4002-1. As such, the Debtor requires additional time to permit completion of the bankruptcy paperwork, which should be in place before any 341 Meeting of Creditors is held.

4. In discussions between the Debtor and Debtor's counsel, it is clear that the Debtor is able to process information, albeit through a more cumbersome process than is typical. As such, Debtor's counsel has recommended that the 341 Meeting should be held either in person or via video conference. Debtor's counsel is attempting to coordinate with the Trustee for the continuance of the scheduled 341 Meeting of Creditors and will cooperate with the Trustee in rescheduling it for an in-person or Zoom meeting due to the Debtor's difficulty in forming answers and the extended time it requires for the Debtor to provide those answers.

WHEREFORE, the Debtor respectfully requests an extension to complete the filing of the Schedules and Statement of Financial Affairs, up to and including **September 1, 2023** and a continuance of the 341 Meeting of Creditors until a later date, in accordance with the Trustee's availability and to be held either in person or via video conference.

Respectfully submitted,

/s/ Patricia J. Friesinger

Patricia J. Friesinger (00072807)
33 W. First Street, Suite 200
Dayton, OH 45402
Tel: (937) 449-5776 Fax: (937) 223-6705
E-Mail: friesinger@coollaw.com
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on the date of filing, a true and correct copy of the foregoing **SECOND MOTION TO EXTEND TIME TO FILE THE REMAINING DOCUMENTS: SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS AND MOTION TO CONTINUE THE 341 MEETING OF CREDITORS** was served on the following registered ECF participants, **electronically** through the court's ECF system at the email address registered with the court:

- Asst us trustee (cin) ustpregion09.ci.ecf@usdoj.gov
- Patricia J Friesinger friesinger@coollaw.com, trustee@coollaw.com
- Elliott Polaniecki elliottp@cinci.rr.com, epolaniecki@ecf.axosfs.com

Via regular U.S. Mail, postage prepaid, to the parties in interest on the attached Matrix and listed below on the date of filing.

Ryan Anthony Preston Todd
8120 State Route 28
Leesburg, OH 45135

Bridgecrest Acceptance Corporation
AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118

/s/ Patricia J. Friesinger

Patricia J. Friesinger

Label Matrix for local noticing

0648-1

Case 1:23-bk-11308

Southern District of Ohio

Cincinnati

Wed Jul 26 11:58:11 EDT 2023

Asst US Trustee (Cin)

Office of the US Trustee

J.W. Peck Federal Building

550 Main Street, Suite 4-812

Cincinnati, OH 45202-5212

Carvana

1930 W Rio Salado Pkwy

Tempe, AZ 85281-2361

Patricia J Friesinger

Coolidge Wall Co., L.P.A.

33 West First Street, Suite 600

Dayton, OH 45402-1289

Internal Revenue Services

PO Box 7346

Philadelphia, PA 19101-7346

Jessica Todd

8120 State Route 28

Leesburg, OH 45135-9357

Kettering Health Network

PO Box 182041

Columbus, OH 43218-2041

Miami Valley Hospital

PO Box 713072

Columbus, OH 43271-3072

Ohio Department of Taxation

PO Box 530

Columbus, OH 43216-0530

Radiology Physicians Inc.

One Wyoming St.

Dayton, OH 45409-2722

AT&T

PO Box 537104

Atlanta, GA 30353-7104

Bridgecrest Acceptance Corporation

AIS Portfolio Services, LLC

4515 N Santa Fe Ave. Dept. APS

Oklahoma City, OK 73118-7901

Emergency Medicine Specia

3131 Newmark Dr.

#210

Miamisburg, OH 45342-5400

Highland County Common Pleas

105 N High St

Hillsboro, OH 45133-1076

James O'Neil

8671 Hawthorne Place

Springboro, OH 45066-9684

Joseph Sprafka

455 Delta Ave.

Suite 108

Cincinnati, OH 45226-1170

Kettering Network Radiolo

3451 Newmark Dr.

Miamisburg, OH 45342-5426

Morris Home Furniture

2377 Commerce Center Blvd

Fairborn, OH 45324-6378

Elliott Polaniecki

P O Box 42341

Cincinnati, OH 45242-0341

Springfield Regional

100 Medical Center Dr.

Springfield, OH 45504-2687

Air Methods Corporation

5500 S Quebec St

Suite 300

Englewood, CO 80111-1926

Butler County Common Pleas Court

315 High Street

Hamilton, OH 45011-6085

Erie Constrution Mid-West, LLC

3520 Sudachi Drive

Dayton, OH 45414-2435

I C Systems

PO Box 64378

Saint Paul, MN 55164-0378

Jessica L Todd

8120 State Route 28

Leesburg, OH 45135-9357

Kemp, Schaeffer & Rowe Co., L.P.A

88 W Mound St

Columbus, OH 43215-5084

Matthew Chasar

455 Delta Ave.

Suite 108

Cincinnati, OH 45226-1170

Ohio Attorney General

Collections Enforce. Sec. Attn: Bankr.

30 East Broad St., 14th Floor

Columbus, OH 43215-3414

Progressive Leasing

5651 W Talavi Blvd

Glendale, AZ 85306-1875

Steve Robertson Trucking LLC

3191 Millville Shandon Rd

Hamilton, OH 45013-9221

Synchrony Bank
PO Box 960061
Orlando, FL 32896-0061

Ryan Anthony Preston Todd
8120 State Route 28
Leesburg, OH 45135-9357

Transworld Systems Inc
500 Virginia Dr. Ste. 514
Fort Washington, PA 19034-2733

U.S. Small Business Administration
10737 Gateway West #320
El Paso, TX 79935-4910

United Resource Systems
3501 S. Teller St
Denver, CO 80235-2011

VT Freedom Truck Finance
12221 Merit Drive, Ste. 1175
Dallas, TX 75251-2342

(p)WRIGHT PATT CREDIT UNION
3560 PENTAGON BLVD
BEAVERCREEK OH 45431-2779

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Wright Patt Credit Union
PO Box 286
Fairborn, OH 45324-0286

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Alliance Physicians Speci

(u)Emergency Medicine Physic

End of Label Matrix	
Mailable recipients	36
Bypassed recipients	2
Total	38